

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Felicity Michelle Walker  
Terry Lee Walker, Debtors**

**Case No. 24-51720-KMS  
CHAPTER 13**

**RESPONSE**

COME NOW, Debtors, by and through counsel, and respond to Trustee's Motion to Dismiss (DK #38) as follows:

1. Debtors commenced this case on 12/02/2024 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. Debtors can continue making the plan payments.

WHEREFORE, Debtors pray for an Order denying the Motion and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.  
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Attorney for Debtor

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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Response was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr.